

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

Eric Forsythe, Individually And On Behalf Of All Others Similarly Situated,)	
)	
)	
Plaintiff,)	
)	Civil Action No. 04cv10584 (NG)
vs.)	
)	
Sun Life Financial Inc., et al.,)	
)	
Defendants.)	
)	
Larry R. Eddings, Individually And On Behalf Of All Others Similarly Situated,)	
)	
)	
Plaintiff,)	
)	Civil Action No. 04cv10764 (NG)
vs.)	
)	
Sun Life Financial Inc., et al.,)	
)	
Defendants.)	
)	
)	

**MOTION FOR APPOINTMENT OF CO-LEAD COUNSEL
AND APPOINTMENT OF LIAISON COUNSEL**

Plaintiffs Eric Forsythe and Larry R. Eddings (“Plaintiffs”), by their counsel, hereby move this Court for an Order (attached hereto) approving Plaintiffs’ selection of: (i) Milberg Weiss Bershad & Schulman LLP (“Milberg Weiss”) and Weiss & Yourman as Co-Lead Counsel to oversee the above-captioned actions (the “Actions”); and (ii) Moulton & Gans, P.C. as Liaison Counsel. In support of this Motion, Plaintiffs submit herewith a Memorandum of Law, a Declaration, and [Proposed] Pretrial Order No. 2 For Appointment Of Co-Lead Counsel And Appointment Of Liaison Counsel.

Dated: May 14, 2004

Respectfully submitted,

MOULTON & GANS, P.C.

By: /s/ Nancy Freeman Gans

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LOCAL RULE 7.1 CERTIFICATE

I, Nancy Freeman Gans, counsel for plaintiffs Eric Forsythe and Larry R. Eddings, certify that I have notified, as a courtesy, Jonathan Shapiro of Hale & Dorr LLP and George J. Skelly of Nixon Peabody LLP, about the filing of the Motion For Appointment of Co-Lead Counsel And Appointment of Liaison Counsel and consulted with them about the service issue. I further certify that Daniel P. Dietrich, counsel for plaintiff Eric Forsythe, has consulted with John J. Falvey, Jr. of Testa, Hurwitz & Thibault on the service issue. I have left messages with James C. Rehnquist of Goodwin Proctor LLP and John D. Donovan of Ropes & Gray LLP but have been unable to confer with them.

Dated: May 14, 2004

/s/ Nancy Freeman Gans
Nancy Freeman Gans

CERTIFICATE OF SERVICE

I, Nancy Freeman Gans, hereby certify that a true copy of the above document was served upon the attorney of record for each party by first class mail, postage prepaid, on May 14, 2004.

/s/ Nancy Freeman Gans
Nancy Freeman Gans